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REMARKS

Applicants appreciate the thorough examination of the present application as evidenced by the Office Action and the allowance of Claims 59, 60, 77 and 78 and indication of allowable subject matter in Claims 5, 13, 21-25, 31, 39, 53-58 and 63. Applicants submit that the present rejections should be withdrawn for at least the reasons discussed below. Rather than repeat arguments from Applicants' previous Amendment, that Amendment is incorporate herein by reference so that this Amendment will be fully responsive to the present rejections.

The Rejections:

Claims 1-4, 6-11, 14-16, 19, 20, 51, 52, 69 and 70 stand rejected under 35 U.S.C. § 102 as being anticipated by United States Patent No. 4,115,665 to Giacoppo *et al.* ("Giacoppo"). Office Action, p.2. Claims 27-30, 32-37, 40-42 and 45-48 stand rejected under 35 U.S.C. § 103 as being unpatentable over Giacoppo in view of United States Patent No. 6,238,250 to Stohr *et al.* ("Stohr"). Office Action, p.10. Claim 12 stands rejected under 35 U.S.C. § 103 as being unpatentable over Giacoppo in view of United States Patent No. 5,704,797 to Myerhoefer *et al.* ("Myerhoefer"). Office Action, p.15. Claim 38 stands rejected under 35 U.S.C. § 103 as being unpatentable over Giacoppo in view of Stohr and Myerhoefer. Office Action, p. 16. Claims 17, 18, 26, 61-62, 71-72, 75-76 and 79-82 stand rejected under 35 U.S.C. § 103 as being unpatentable over Giacoppo in view of United States Patent No. 6,093,050 to Baum *et al.* ("Baum"). Office Action, p.17. Claims 43, 44, 49, 73 and 74 stand rejected under 35 U.S.C. § 103 as being unpatentable over Giacoppo in view of Stohr and in view of Baum. Office Action, p. 19. Applicants will address the rejections of each of the independent claims below.

Independent Claims 1 and 27 Are Patentable:

The Office Action continues to reject Claims 1 and 27 over Giacoppo. In the Response to Arguments section, however, additional explanation of the basis of the rejection is provided. In particular, the rejection is clarified by asserting that the conductors 22a, 22b

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of Giacoppo disclose service wire connectors as recited in Claims 1 and 27 because they are "able to receive a customer telecommunications conductor which can come from lines 12a and 12b via conductors 13a, 13b when the service module is mounted on the terminal block." Office Action, p. 22.

As an initial matter, Applicants again submit that the conductors 22a, 22b, contrary to the assertion of the Office Action, are not "connectors" as recited in Claims 1 and 27. Nonetheless, to expedite prosecution in this matter Applicants have further amended Claims 1 and 27 responsive to the comments quoted above from the Office Action. In particular, Claim 1 has been amended to recite "wherein the service wire connector connects the customer telecommunications conductor to the first conductor through the contact member when the service module is mounted to the base ." Corresponding recitations have been added to Claim 27. Thus, by way of example with reference to Figures 4 and 6 of the present application, the service wire connector 542 connects through the contact member 544 to the conductor 316.

In contrast, even assuming the term "connector" could be properly interpreted broadly enough to encompass the conductors 22a, 22b of Giacoppo, as acknowledged in the Office Action, Giacoppo provides the customer telecommunications conductor connection through springs 13a, 13b to the conductors 22a, 22b, not the opposite as now recited in Claims 1 and 27. Accordingly, the rejections of Claims 1 and 27 and the claims that depend therefrom should also be withdrawn for at least these additional reasons.

Independent Claim 51 is Patentable:

Applicants respectfully submit that, not only does Giacoppo fail to disclose or suggest the recitations of Claim 51, but the rejection fails to even explain what features of Giacoppo disclose each of the recitations of Claim 51 and how those relied on features are arranged in the manner recited in Claim 51. As this may result from some confusion as to these particular recitations, Applicants provide the following example of an illustrated embodiment covered by Claim 51 and shown in Figures 10A and 10B of the present application. For the Examiner's convenience, this example will be presented by insertion of reference numerals in

Claim 51 by way of example and without limiting or narrowing the scope of other variations of a telecommunication terminal block covered by Claim 51:

A telecommunications terminal block for making and breaking connections between a first telecommunications conductor, a second telecommunications conductor and a service wire, said terminal block comprising:

- a housing having a first connector **818** connected to the first telecommunications conductor **802** and a second connector **822** connected to the second telecommunications conductor **800** mounted therein;
- a first conductor **840** in the housing, the first conductor being electrically connected to the first connector **818** and having a service wire connector portion **838** configured to receive the service wire **808**;
- a switch electrically connecting the first connector **818** and the second connector **800**, the switch having a first state **Fig. 10A** wherein the first connector is electrically connected to the second connector and a second state **Fig. 10B** wherein the first connector is electrically disconnected from the second connector, the switch comprising:
 - a third connector **828** mounted adjacent the second connector **800** in the housing, the first connector **818** being electrically connected to the third connector **828** (by wire **850**); and
 - a select module **816** positioned over the second connector and the third connector, the select module having a first position in the housing electrically connecting the second connector and the third connector and a second position in the housing wherein the second connector and the third connector are not electrically connected.

Applicants respectfully submit that there simply is no such arrangement of features in Giacoppo. To the extent the Examiner continues to disagree after reviewing the recitations of Claim 51 in light of the illustrative example of Figures 10A and 10B presented above, Applicants respectfully request clarification from the Examiner of what numbered items of Giacoppo are relied on as disclosing the features of Claim 51 and how those items of Giacoppo are interrelated in the manner recited in Claim 51. As Applicants submit there is no such teaching in Giacoppo, the rejections of Claim 51 and the claims that depend therefrom should be withdrawn for at least these reasons.

Independent Claim 61 is Patentable:

The previously applied rejection of Claim 61 is supplemented merely by asserting, without explanation, that Baum teaches an electrical protection device "position in series

between" and electrically connecting "the first connector and the second connector." Office Action, p. 18. Applicants respectfully disagree and, as with Claim 51, will attempt to clarify the Examiner's understanding of the in series recitation by reference to an illustrative example of the invention of Claim 61 by reference to Figure 13 (and Figure 10A for various reference numbers not repeated in Figure 13):

A telecommunications terminal block for making and breaking connections between a telecommunication conductor and a service wire, said terminal block comprising:

a housing having a first connector **822** and a second connector **818** mounted therein, the first connector being electrically connected to the telecommunication conductor **800**;

a first conductor **840** in the housing, the first conductor being electrically connected to the second connector **818** and having a service wire connector portion **838** configured to receive the service wire;

an electrical protection device **880** positioned in series between and electrically connecting the first connector **822** and the second connector **818**.

Thus, the device 880 is positioned in series between a customer ring line 808 and the telco ring line 800 (or customer tip line 810 and telco tip line 804). In contrast, the protection device of Baum corresponds to the device 870 illustrated in Figures 11A and 11B of the present specification, arranged across the tip and ring lines with an intermediate ground contact for shorting both the tip and ring lines rather than opening a respective one of those lines. Accordingly, the rejections of Claim 61 and Claim 62 that depends therefrom should be withdrawn for at least these reasons.

The Dependent Claims Are Patentable:

Each of the dependent claims is patentable at least based on the patentability of the independent claim from which it depends. Applicants further submit that various of the dependent claims are also separately patentable for reasons discussed in the Applicants' previous Amendment, which reasons will not be repeated herein. Applicants do, however, note that the rejection of Claims 12 and 38, which each recite an "insulation displacing connector," is not supportable. Even assuming the conductors 22a, 22b of Giacoppo can be considered as "connectors," given that they are actually conductors, one of skill in the art

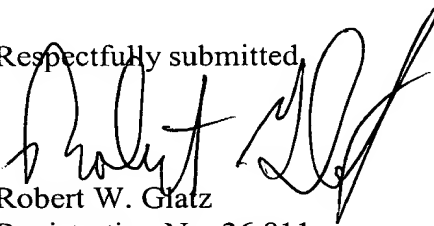
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would simply not be motivated to replace the conductors 22a, 22b with the insulation displacing connector of Meyerhoefer. Office Action, pp. 15-16. Not only is the assertion in the Office Action that "it would have been obvious that the service wire connector is [sic] Giacoppo is an insulation displacing connector since the service wire connector is able to break the connection by touching the two conductor wires" unsupportable, it is unclear how the conductors 22a, 22b could be replaced by an insulation displacing connector. An insulation displacing connector, as clear from the words used and the understanding of those of skill in the art, provides a connection by displacing insulation on a conductor. Merely touching two conductor wires, without displacing insulation thereon, is simply not an insulation displacing connector. Applicants submit that the Claims 12 and 38 are separately patentable for at least these reasons.

Conclusion

Applicants respectfully submit that, for the reasons discussed above, the references cited in the present rejections do not disclose or suggest the present invention as claimed. Accordingly, Applicants respectfully request allowance of all the pending claims and passing this application to issue.

Respectfully submitted,



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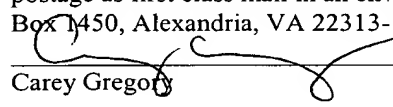
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